IN THE UNITED STATES DISTRICT COURT DISTRICT OF SOUTH CAROLINA GREENVILLE DIVISION

James Van Connor)	CA: 6:19-cv-3283-BHH
)	
Plaintiff,)	
)	
V.)	
)	
Foresters Financial Services, Inc.)	
and One Life America, Inc.)	
)	
)	
Defendant.)	

PLAINTIFF'S MOTION TO SUBSTITUTE PARTY NAME

The plaintiff James Van Connor moves to substitute the party name "The Independent Order of Foresters" for the currently named "Foresters Financial Services, Inc.". Fed. R. Civ. P. 21 states that "Parties may be ... added by order of the Court on motion of any party or of its own motion at any stage of the action and on such terms as are just." Here, even though the Plaintiff received an insurance quote that identified Foresters Financial Services, the defendants have claimed in discovery that proper party name is "The Independent Order of Foresters", which One Life America, Inc. maintained a relationship with.

Pursuant to Local Rule 7.02, counsel for the plaintiff consulted Defendant's counsel prior to the filing of this motion.

DAVE MAXFIELD, ATTORNEY, LLC

By: /s/ Dave Maxfield
David A. Maxfield, Fed. ID 6293

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CERTIFICATE OF SERVICE

I hereby certify that on March 2, 2020, I filed the foregoing through the Court's CM/ECF system.

By: /s/ Dave Maxfield
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